

## **ENGINEERING ANALYSIS**

### **FACILITY HISTORY**

Sklar Exploration Company, LLC (Sklar) operates Oil & Gas Production Area No. 6 (Area 6) under SMOP Nos. 502-0103-X001 and 502-0103-X002 in northern Escambia County, south of Castleberry, AL in Sections 13 & 24, Township 3 North, Range 10 East. Area 6 is currently comprised of 3 oil & gas wells: CCL&T 13-11 #1 well, CCL&T 13-15 #1 well (formerly CCL&T 13-16 #1), and CCL&T 24-1 #1; one 203 HP Caterpillar G3306B engine (for gas lift), two 163 HP Waukesha F1197 engines (for power oil lift), one 145 HP Caterpillar G3306B/NA engine (for power generation), and two 68 HP Arrow VRG330 engines (also for power generation) are permitted for use within Area 6.

### **PROJECT DESCRIPTION**

On 5/3/17, the Department received a new application from Sklar requesting to add two additional well sites—each with tanks, flare, heater, and two engines—to Area 6. The wells would be the CCL&T 18-13 and tentatively the CCL&T 14-9. The mineral rights for both lie within quarter-sections adjacent to those of the established wells in Area 6.

Each well would operate with one 163 HP Waukesha F1197 power oil pump engine for artificial lift and and one 68 HP Arrow VRG330 generator engine. Sklar estimates 150 bbl/day of oil and 300 Mscf/day of gas production from each. The average heat value of the gas at the three established wells is 1462.1 Btu/scf (at 14.65 psia and 60 °F) based on recent test reports submitted in the application.

The engines throughout Area 6 are numerous, and for organizational purposes will be referred to as follows in this analysis and in future permits:

Well	Lift Engine	New Name	Generator Engine	New Name
CCL&T 24-1 #1	163 HP Waukesha	LIFT-1	68 HP Arrow	GEN-1
CCL&T 13-11 #1	203 HP Caterpillar	LIFT-2	68 HP Arrow	GEN-2
CCL&T 13-15 #1	163 HP Waukesha	LIFT-3	145 HP Caterpillar	GEN-3
CCL&T 18-13 #1	163 HP Waukesha	LIFT-4	68 HP Arrow	GEN-4
CCL&T 14-9 #1	163 HP Waukesha	LIFT-5	68 HP Arrow	GEN-5

*Table 1 – Engine listing*

### **PROCESS DESCRIPTION**

At each well site, the crude oil and produced water streams exiting out of the heater treater flows on to the power oil tank and salt water tank. Natural gas from the separators is routed to the pipeline when possible and the well-site flare when not. Flash vapor from the power oil tank and breathing and working losses from all the storage tanks is collected and sent to the flare for combustion. The flare at the well uses produced gas as pilot gas. The wells in Area 6 all reflect this general setup.

At the 13-11 well, LIFT-2 drives a compressor which provides artificial lift (which improves yield) by injecting gas into the well to increase the flow of the produced wellstream; GEN-2 drives a generator to provide power for the site. At the 24-1 well, LIFT-1 drives a power oil pump used to recirculate crude from the power oil tank back into the well to provide artificial lift, while its GEN-1 drives a generator to provide power for the site. At the 13-15 well (site of the dry 13-16 well), LIFT-3 will also drive a power oil pump when constructed, while GEN-3 will drive a generator for the site (Sklar requested a larger generator at the 13-15 site in case they expand operations in the area in the future, possibly placing the processing equipment for a new well on the same surface location of the 13-15 well). The 18-13 and 14-9 wells will have engine setups mirroring the 24-1 well with the engines designated LIFT-4, GEN-4, LIFT-5, and GEN-5.

## PROCESS EMISSIONS

The potential emission sources for the facility currently include separators, tanks, and engines at the three established well sites. The increase in potential emissions from this project would come from similar equipment at the two additional well sites.

Heater emissions are determined using EPA's AP-42 factors. Emissions from the separators and tanks at each site are controlled by flares; potential to emit (PTE) for the flares is determined by AP-42 factors and mass balance based upon continuously burning gas at rates reported in the 2015 engineering analysis for SMOP No. 502-0103-X001 for the three established wells and 300 MMscf/day for the two proposed wells. The gas qualities for both the three established wells and the two proposed wells are from the gas analyses in Sklar's new application for this project. The Department calculates flare PTE from oil & gas wellsites as if all produced gas gets flared while oil production continues, though in ideal & typical practice Sklar sells both its gas and its oil.

Potential to emit (PTE) for the currently permitted LIFT-2 and GEN-3 were calculated as if the engines would operate at the limits imposed on them by 40 CFR Part 60 Subpart JJJJ. Those limits are: 1.0 g(NO<sub>x</sub>)/HP-hr, 2.0 g(CO)/HP-hr, and 0.7 g(VOC)/HP-hr. These engine are controlled by EMIT Technologies non-selective catalytic reduction devices (catalytic converters) capable of meeting those limits. LIFT-1 is subject to Subpart JJJJ's reconstructed engine limits of 3.0 g(NO<sub>x</sub>)/HP-hr, 4.0 g(CO)/HP-hr, and 1.0 g(VOC)/HP-hr, and its PTE is calculated as if it met those limits (though its catalytic converter is rated for better). GEN-1, GEN-2, & LIFT-3 are uncontrolled, and their calculated PTE reflects that.

Sklar has not ordered the individual engines that will be put into use at the 18-13 and 14-9 wells, but they have asserted in their application that they will be two 163 Waukesha F1197 HP power oil pump engines (LIFT-4 & LIFT-5) and two 68 HP Arrow VRG330 generator engines (GEN-4 & GEN-5), each constructed prior to 2006 and not subject to Subpart JJJJ. They have indicated their intent to operate all engines with EMIT Technologies NSCR devices regardless of not being subject to Subpart JJJJ.

For all engines with a catalytic converter, the estimated uncontrolled VOC emissions are lower than the maximum VOC emissions guaranteed by EMIT Technologies. This is because the engines are burning natural gas instead of LPG fuel, while EMIT Technologies' catalytic converters are designed to abide by the Subpart JJJJ standards of NO<sub>x</sub>, CO, and VOC emissions at less than 1.0, 2.0, and 0.7 g/HP-hr respectively (standards which are shared by both natural gas and lean-burn LPG engines). Due to the nature of NSCR control devices, the VOC from the exhaust of natural gas engines will be controlled by those catalytic converters, but EMIT Technologies have just not quantified how much they will control below the 0.7 g/HP-hr level. This analysis will thus use the lower, "uncontrolled" VOC emission factors reported by Caterpillar and Waukesha, though the true PTE for VOC from these engines will be lower. The VOC factor from Waukesha is further inflated because it is reported as non-methane hydrocarbons (ethane + VOC).

Table 2 below shows the potential emissions of the facility after only accounting for required controls on the separators & tanks (flares) and engines subject to Subpart JJJJ limits (catalytic converters), drawing from data from past applications and analyses for the existing emission sources.

	Pollutant	Heaters	Flares	Engines	Total Emissions
Criteria Pollutant Emissions (TPY)	PM	0.11	0.78	0.42	1.31
	SO <sub>2</sub>	0.01	0.30	0.05	0.36
	NO <sub>x</sub>	1.66	29.82	106.66	138.14
	CO	1.17	162.24	128.54	291.95
	VOC	0.08	172.25	6.98	179.31
	Total HAPs	0.03	18.17	1.97	20.17
GHG Emissions (TPY)	CO <sub>2</sub>	1,766.54	56,158.83	5,213.78	63,139.15
	N <sub>2</sub> O	0.01	0.10	0.01	0.12
	CH <sub>4</sub>	0.06	160.85	3.67	164.58
	Mass Sum	1,766.61	56,319.78	5,217.46	63,303.85
	CO <sub>2e</sub>	1,770.67	60,208.97	5,308.58	67,288.21

Table 2 – Facility Potential Emissions after required control devices

Area 6 is subject to facility-wide SMOP limits of 95 TPY for CO. When writing the initial permit (X001), to allow for growth the Department did not require Sklar to adhere to a flare-specific CO limit derived by taking 95 TPY CO and subtracting the Engine and Heater PTE values calculated at the time. The actual flare emissions from the 12 months prior to January 1, 2017 were given in the semi-annual report as 6.002 Tons CO, which illustrates the capability of the facility to meet its current SMOP limits of 95 TPY for CO facility-wide without the need for a flare-specific limit even if the number of flares in operation were increased with the operation of 13-15 well and the addition of 18-13 and 14-9 wells. In practice, Sklar only flares when there are pipeline or other process problems disrupting the transfer of gas to the nearby gas plant, or if the well's production is too low to produce gas with adequate pressure to be transported through the pipeline.

Sklar has indicated their intention use NSCR converters on LIFT-3 when installed and on each engine at the 18-13 and 14-9 wells when permitted, though Subpart JJJJ standards that would necessitate that do not apply to that engine. Without using catalytic converters for those engines not subject to JJJJ, the total engine potential emissions are ~128.54 TPY CO and ~106.66 TPY NO<sub>x</sub>, plus ~1.17 TPY CO and ~1.66 TPY CO from the heaters, exceeding the 100 TPY SMOP threshold for each without considering the emissions from Sklar's flares (which are more flexible).

## EMISSIONS LIMITS

SMOP Nos. 502-0103-X001 & -X002 have a facility-wide 95 TPY limit on CO because when the SMOP was issued, CO was the only criteria pollutant with a calculated PTE of greater than the 100 TPY for major sources. At the time, the second-closest criteria pollutant to the 100 TPY threshold was VOC with ~78 TPY; VOC now exceeds the 100 TPY threshold after considering the new units in this proposal. Therefore, Sklar has requested a 95 TPY SMOP limit for VOC with the addition of these two wells. The flares at Area 6 have the potential to emit greater than 10 TPY of n-hexane (a HAP) based on the information provided in their application, which would exceed the 10 TPY major source threshold for any single species of HAP; they would not exceed the major-source threshold of 25 TPY multi-species HAPs. However, based on data provided to me, if facility's VOC emissions were limited to 95 TPY and if 7 TPY of that VOC were from the engines, Area 6 would always remain under 10 TPY of n-hexane emissions. Therefore the facility-wide SMOP limit for VOC effectively also functions as a SMOP limit for n-hexane.

There are unit-specific limits on LIFT-2, LIFT-1, and GEN-3 proscribed by NSPS Subpart JJJJ (reconstructed limits for GEN-3). Table 3 below shows the Subpart JJJJ standard in question for engines of this power.

	JJJJ Emission Standards					
	g/HP-hr			ppmvd at 15% O <sub>2</sub>		
	NO <sub>x</sub>	CO	VOC	NO <sub>x</sub>	CO	VOC
<b>New</b>	1.0	2.0	0.7	82	270	60
<b>Reconstructed</b>	3.0	4.0	1.0	250	540	86

Table 3 – Subpart JJJJ Engine Emission Standards

Neither the LIFT-3 nor any of the proposed engines at the new wells will be subject to NSPS Subpart JJJJ based on their construction dates. Because the facility cannot operate under 100 TPY CO and NO<sub>x</sub> if these engines were to be uncontrolled and because the Department cannot account for the control devices Sklar has volunteered to use without a limit and/or permit provision when evaluating PTE, Sklar has proposed that they will operate LIFT-3, LIFT-4, LIFT-5, GEN-4, & GEN-5 with the EMIT Technologies catalytic converters specified in the application. Sklar will show continuous compliance by calculating its total emissions every month, and to do so Sklar will test its engines to determine emission factors to be used in those calculations.

## REGULATIONS

### STATE REGULATIONS

#### ***ADEM Administrative Code Rule 335-3-4-.01(1)(a and b), “Visible Emission”***

**ADEM 335-3-4-.01(a)** states that no person shall emit to the atmosphere an opacity of greater than twenty percent (20%) over a six (6) minute period. **ADEM 335-3-4-.01(b)** states that during one six minute period in any sixty minute period a person may discharge into the atmosphere from any source of emissions, particulate of an opacity not greater than that designated as forty percent (40%) opacity. Therefore, the units would be subject to this regulation. Since natural gas, or propane as a back-up, would be burned in those units, opacity should be negligible; however, if visible emissions are observed, the opacity should be determined using Method 9 of 40 CFR Part 60 Appendix A.

#### ***ADEM Administrative Code Rule 335-3-5-.01(b), “Fuel Combustion”***

This regulation covers fuel combustion sulfur limitations for Category II counties, which includes Escambia County. This regulation requires that fuel combustion source in Category II counties limit sulfur compounds to less than 4.0 lb/MMBtu. The fuel-burning units burn propane and raw natural gas (with no appreciable H<sub>2</sub>S) and accordingly have negligible SO<sub>2</sub> emissions.

#### ***ADEM Administrative Code, Rule 335-3-14-.04, “Prevention of Significant Deterioration (PSD) Permitting”***

Based on the emissions found in Tables 2, the facility could exceed 250 tons per year (TPY) major source threshold for criteria pollutants for this type of facility (oil & gas production facilities are not one of the 28 source categories listed in this regulation) for CO. However, the facility currently operates and will continue to operate under a 95 TPY limit on CO, which is far more stringent than an anti-PSD limit such as 249 TPY CO. Greenhouse Gas (GHG) Regulations require a facility to address PSD regulations for Greenhouse Gases. Greenhouse Gases of concern for these sources would be CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>. Per Rule 335-3-14-.04(2)(a)1.(i)&(ii), no PSD review would be necessary for this project.

**ADEM Admin. Rule 335-3-14-.06, “Determinations for Major Sources in Accordance with Clean Air Act Section 112(g)”**

This regulation applies to major sources of hazardous air pollutants (HAPs) constructed after March 27, 1998. Since the addition the new units would not make this facility a major source of HAPs, a 112(g) case by case MACT review would not be necessary.

**ADEM Administrative Code, Rules 335-3-15, “Synthetic Minor Operating Permits (SMOPs)” and 335-3-16, “Major Source Operating Permits (MSOPs)”**

The combined PTE of the wells exceed the 100 TPY major source threshold for CO, NO<sub>x</sub>, & VOC., and the facility also is also presumed to have the potential to emit greater than 10 TPY or more of a single HAP (n-hexane) as shown in Table 2. However, because Sklar accepted a 95 TPY limit on CO, NO<sub>x</sub>, & VOC and because that 95 TPY limit on VOC essentially functions as a <10 TPY limit on n-hexane, the facility operates as a synthetic minor for both criteria pollutants and HAPs. Additionally, Sklar has adopted unit-specific SMOP limits on several engines to meet their facility-wide SMOP limits for NO<sub>x</sub> and CO; namely, Sklar will operate catalytic converters on LIFT-3, LIFT-4, LIFT-5, GEN-4, & GEN-5 and will test each combination of engine model and control device models among those every 5 years for NO<sub>x</sub> and CO emission factors.

**FEDERAL REGULATIONS**

**40 CFR Part 60 Subpart A, “General Provisions”**

This subpart is applicable given that facility is subject to one of the applicable subparts found under 40 CFR Part 60.

**40 CFR Part 60 Subpart JJJJ, “Standards of Performance for Stationary Spark Ignition Internal Combustion Engines”**

This subpart is applicable to stationary spark ignition internal combustion engines as specified in §60.4230(a)(1)-(6). LIFT-2 and GEN-3 were manufactured in after 2011, meaning the provisions of §60.4233(e) and the applicable standards of Table 1 of that Subpart are applicable to those engines. LIFT-1, which the Department approved operation of on 5/12/17, was manufactured in 1974 and was reported to be reconstructed after June 12, 2006. It is subject to the standards for reconstructed stationary natural gas engines above 100 HP [§60.4233(f)(4)].

GEN-1, GEN- 2, LIFT-3, LIFT-4, GEN-4, LIFT-5, & GEN-5 were all manufactured in prior to 2006 according to their applications, meaning only the provisions of §60.4236 are applicable to those engines [§60.4230(a)(6)]. However, because that engines have not been reported to be modified or reconstructed since June 12, 2006, those listed engines are not subject to this subpart.

	JJJJ Emission Standards					
	g/HP-hr			ppmvd at 15% O <sub>2</sub>		
	NO <sub>x</sub>	CO	VOC	NO <sub>x</sub>	CO	VOC
New	1.0	2.0	0.7	82	270	60
Reconstructed	3.0	4.0	1.0	250	540	86

Table 3– Subpart JJJJ Engine Emission Standards

**40 CFR Part 60 Subpart OOOOa, “Standards of Performance for Crude Oil and Natural Gas Facilities For Which Construction, Modification or Reconstruction Commenced After September 18, 2015”**

This regulation was promulgated by EPA contains SO<sub>2</sub> and VOC requirements for natural gas production wells and natural gas processing plants constructed, reconstructed, or modified after September 18, 2015. The following table summarizes the portions of this regulation that apply specifically to well sites as affected facilities under this regulation:

AFFECTED SOURCES	APPLICABILITY
Each well [§60.5365(a)]	This applies to a single gas or oil well that is hydraulically fractured or re-fractured
Pneumatic Controller [§60.5365(d)(1) and (2)]	This applies to a single continuous-bleed natural-gas-driven pneumatic controllers with a bleed rate of > 6 scf/hr at an oil or natural gas production segment
Storage Vessels [§60.5365(e)]	This applies to a single storage vessels located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment that has potential VOC emissions > 6 TPY
Hydraulically Fractured Gas Wells [§60.5365(i)]	This applies to the collection of fugitive emissions components at a well site

*Single Well*

The 18-13 and 14-9 wells would not be affected sources under this subpart since they will be neither hydraulically fractured nor refractured, being in the Smackover layer.

*Pneumatic Controller*

Sklar has not indicated that they intend to construct any continuous-bleed gas-driven controllers at the 18-13 and 14-9 wells; therefore, the Department does not expect pneumatic controller affected sources as defined by this subpart to be present.

*Storage Vessels*

The storage vessels at the 18-13 and 14-9 wells will be constructed after September 18, 2015; the power oil tanks would be considered a Group 2 storage vessel under this subpart based on its uncontrolled emissions. At the wells, tank vapor is routed to a flare for combustion. §60.5365a(e) however only applies to tanks with an uncontrolled PTE of greater than 6 TPY of VOCs, and the determination of PTE “may take into account requirements under a legally and practically enforceable limit in an operating permit or other requirement established under a Federal, State, local or tribal authority”. Because the permit includes a stipulation that Sklar may not emit gas without combustion, the closed-vent systems and flares should be included in the PTE determination of potentially subject tanks. Post-control device, the VOC emissions from all tanks are <6 TPY, and the tanks do not meet the definition of *storage vessels* under Subpart OOOOa.

*Fugitive Emissions Components at a Well Site*

Fugitive emissions components at the 18-13 and 14-9 wells applicable to this regulation will include the pumps, pressure relief devices, valves, connectors, and other required devices/systems (except compressors) in capable of leaking methane or VOC. As outlined in §60.5397a(a), the aforementioned equipment are subject to the leak standards in §60.5397a(b)-(g), the reporting requirements of §60.5397a(j) and the recordkeeping requirements of §60.5397a(i).

#### **40 CFR Part 63 Subpart A, “General Provisions”**

This subpart is applicable only provided that the facility is subject to one of the applicable subparts found under 40 CFR Part 63.

#### **40 CFR 63 Subpart ZZZZ, “National Emission Standards for Hazardous Air Pollutant for Stationary Reciprocating Internal Combustion Engines (RICE)”**

This regulation is also referred to as the RICE MACT and is applicable to any stationary reciprocating internal combustion engine that would be located at a major source of HAPs emissions or an area source of HAPs emissions. A stationary RICE at an area source of HAP emissions is existing if construction of that unit is commenced before June 12, 2006 (§63.6590(a)(1)(iii)). GEN-3 and LIFT-2 are therefore classified as a new RICE. Altogether, they are classified as a new, non-black-start 4SRB stationary RICE located at an area source; their status as *remote* has not been determined. ADEM has not adopted the area source provisions of Subpart ZZZZ, but to comply with federal regulations Sklar must meet the requirements under Subpart ZZZZ. §63.6590(c)(1) states that the requirements of Subpart ZZZZ are met by complying with Part 60 Subpart JJJJ. LIFT-1 is a reconstructed source rather than a new source. However, §63.6590(c)(1) applies to both reconstructed and new sources, so it would meet the requirements of Subpart ZZZZ by complying with the applicable requirements of Subpart JJJJ.

GEN-1, GEN-2, LIFT-3, LIFT-4, GEN-4, LIFT-5, & GEN-5 were first placed into service prior to the effective date for this regulation, and because the definition for *construction* in §63.2 specifically excludes the removal and reassembling of a unit as construction, so they would be classified as existing RICEs. Altogether, they would be classified as existing, non-black start, <500 HP, 4SRB stationary RICEs located at an area source. The engines’ status as *remote* or non-*remote* was not determined. ADEM has not adopted the area source provisions of Subpart ZZZZ, but to comply with federal regulations Sklar must meet the requirements under Subpart ZZZZ. Sklar should meet the following EPA requirements for the above engines:

##### *Emission Standards*

Compliance with this subpart is met by meeting the following work/management practices specified in Table 2d (Nos. 10) of subpart ZZZZ upon startup (§63.6595(a)):

- For the engine, work/management practices involving:
  - Change oil and filter every 1,440 hours of operation or annually, whichever comes first (you have the option of utilizing an oil analysis program in order to extend the specified oil change requirements as specified in 40 CFR §63.6625(j)).
  - Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.
  - Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

At all times, the engine shall be in compliance with the applicable emission limitations, operating limitations, and other requirements (§63.6605(a)). At all times an affected source must be operated and maintained, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions (§63.6605(b)).

The engine’s time spent at idle and the engine’s startup time at startup shall be minimized to a period needed for appropriate and safe loading of the engines, not to exceed 30 minutes after which time the non-startup emission limitations apply (§63.6625(h)).

##### *Compliance and Performance Test Methods and Procedures*

No performance testing is required by Subpart ZZZZ for this engine since there are no Subpart ZZZZ numerical emission standards to comply with.

### *Emission Monitoring*

Continuous compliance with the requirements of this subpart is met by complying with the requirements specified in Table 6 (No. 9) as follows:

- For all the RICE at facility, to show compliance with work/management practices:
  - Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions.  
OR
  - Develop and follow your own maintenance plan which provides, to the extent practicable, maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions (§63.6625(e)(8)).

### *Recordkeeping and Reporting Requirements*

As per §63.6655, records used to show continuous compliance with items in Table 6 must be maintained. No reports are required for the engines because they have less than 500 HP.

## **RECOMMENDATIONS**

This analysis indicates that Area 6 would meet continue to meet the requirements of all federal and state rules and regulations with the addition two new well sites and associated equipment. Based on increased potential emissions, Sklar has proposed 95 TPY NO<sub>x</sub> and VOC limits for the facility to remain a synthetic minor source. The 95 TPY VOC limit would function to also keep Area 6 a synthetic minor or area source for HAPs (hexane) based on information provided in their application. Sklar has also proposed to operate several engines not subject to Subpart JJJJ with control devices in order to remain a synthetic minor source for NO<sub>x</sub> and CO. Additionally, the naming convention of the permitted engines will be altered for the permit.

I recommend that the current SMOPs No. 502-0103-X001 & -X002 be rescinded and replaced with a new X003 permit, which will also include the two new wells proposed in the application.

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R. Jackson Rogers, Jr.  
Industrial Minerals Section  
Energy Branch  
Air Division  
ADEM

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June 29, 2017  
Date



**ATTACHMENT A**  
**TABLES**

DRAFT

Well	Lift Engine	New Name	Generator Engine	New Name
CCL&T 24-1 #1	163 HP Waukesha	LIFT-1	68 HP Arrow	GEN-1
CCL&T 13-11 #1	203 HP Caterpillar	LIFT-2	68 HP Arrow	GEN-2
CCL&T 13-15 #1	163 HP Waukesha	LIFT-3	145 HP Caterpillar	GEN-3
CCL&T 18-13 #1	163 HP Waukesha	LIFT-4	68 HP Arrow	GEN-4
CCL&T 14-9 #1	163 HP Waukesha	LIFT-5	68 HP Arrow	GEN-5

Table 1 – Engine listing

	Pollutant	Heaters	Flares	Engines	Total Emissions
Criteria Pollutant Emissions (TPY)	PM	0.11	0.78	0.42	1.31
	SO <sub>2</sub>	0.01	0.30	0.05	0.36
	NO <sub>x</sub>	1.66	29.82	106.66	138.14
	CO	1.17	162.24	128.54	291.95
	VOC	0.08	172.25	6.98	179.31
	Total HAPs	0.03	18.17	1.97	20.17
GHG Emissions (TPY)	CO <sub>2</sub>	1,766.54	56,158.83	5,213.78	63,139.15
	N <sub>2</sub> O	0.01	0.10	0.01	0.12
	CH <sub>4</sub>	0.06	160.85	3.67	164.58
	Mass Sum	1,766.61	56,319.78	5,217.46	63,303.85
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Table 2 – Facility Potential Emissions after required control devices

	JJJJ Emission Standards					
	g/HP-hr			ppmvd at 15% O <sub>2</sub>		
	NO <sub>x</sub>	CO	VOC	NO <sub>x</sub>	CO	VOC
New	1.0	2.0	0.7	82	270	60
Reconstructed	3.0	4.0	1.0	250	540	86

Table 3 – Subpart JJJJ Engine Emission Standards

**ATTACHMENT B**  
**EMISSION CALCULATIONS**

DRAFT

## LIFT-1

DATA:														
24-1 Gas Lift (LIFT-1)					AP-42 Emission Factors									
					(lb/MMBtu)									
ENGINE TYPE	=	4SRB NG			Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs		
FUEL HEAT CONTENT	=	1,416	Btu/Scf		Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3		
FUEL H2S CONTENT	=	10.00	ppmv		2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2		
MAXIMUM ENGINE HP	=	163	HP		4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2		
ENGINE OP HOURS	=	8,760	Hr		4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2		
ENGINE RATING	=	1.30	MMBtu/hr											
BRAKE-SPECIFIC FUEL CONSUMPTION	=	8,000	Btu/HP-hr		40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors							GWP		
CALCULATION BASIS	=	Controlled and Uncontrolled			Tables C-1 & C-2							N <sub>2</sub> O= 298		
EMISSION FACTORS (EF)		MANUFACTURER'S EF			(kg/MMBtu)							CO <sub>2</sub> = 1		
		Uncontrolled	Controlled			N <sub>2</sub> O	CO <sub>2</sub>	CH <sub>4</sub>				CH <sub>4</sub> = 25		
NO <sub>x</sub>	=	16.57	g/HP-hr	3	Diesel	0.0006	75.04	0.003						
CO	=	16.57	g/HP-hr	4	NG	0.0001	53.06	0.001						
VOC	=	0.12	g/HP-hr		LPG	0.0006	62.72	0.003						
CH <sub>2</sub> O	=	0.25	g/HP-hr		Propane	0.0006	61.46	0.003						
CH <sub>4</sub>	=	1.02	g/HP-hr											
Controlled and Uncontrolled 163 HP Engine Emissions Calculations														
Uncontrolled Controlled														
PM	0.0095 Lb	1.30 MMBtu	8760 Hrs	1 Ton	S.F.						0.05 Tons	0.05 Tons		
	MMBtu	Hr	Year	2000 Lb							Year	Year		
SO <sub>2</sub>	0.0006 lb	1.30 MMBtu	8760 Hrs	1 Ton	S.F.	10 ppmv S					0.01 Tons	0.01 Tons		
	MMBtu	Hr	Year	2000 Lb		3.44 ppmv S					Year	Year		
NO <sub>x</sub>	16.57 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					26.08 Tons	4.72 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
CO	16.57 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					26.08 Tons	6.30 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
VOC	0.12 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					0.19 Tons	0.19 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
CH <sub>2</sub> O	0.2500 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					0.39 Tons	0.39 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
non-CH <sub>2</sub> O HAPs	0.0120 lb	1.30 MMBtu		8,760 Hr	1 Ton	S.F.					0.07 Tons	0.07 Tons		
	MMBtu	Hr		Year	2000 Lb						Year	Year		
CO <sub>2</sub>	1.30 MMBtu	53.06 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons						668.12 Tons	668.12 Tons		
	Hr	MMBtu	kg	Year	1 M Ton						Year	Year		
N <sub>2</sub> O	1.30 MMBtu	0.0001 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons						0.00 Tons	0.00 Tons		
	Hr	MMBtu	kg	Year	1 M Ton						Year	Year		
CH <sub>4</sub>	1.02 g	163.000 HP	1 Lb	8,760 Hr	1 Ton						1.61 Tons	1.61 Tons		
	HP-Hr		453.6 g	Year	2000 Lbs						Year	Year		
Mass Sum	668.12 Tons	+	0.0013 Tons	+	1.6054 Tons						669.72 Tons	669.72 Tons		
	Year		Year		Year						Year	Year		
CO <sub>2</sub> e	668.12 TPY*1		0.0013 TPY*298		1.605 TPY*25						708.63 Tons	708.63 Tons		
	668.12	+	0.38	+	40.14						Year	Year		
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>									

<sup>1</sup> EPA AP-42 factors assume gas to have 2000 gr S/MMScf (at EPA STP). This equates to 3.44 ppmv S, assuming ideal gas. AP-42 factor can be corrected to sulfur value of facility gas by comparing actual sulfur values to EPA reference point. Assume ppmv H<sub>2</sub>S = ppmv S (true if H<sub>2</sub>S = TRS and TRS is entirely monosulfur compounds).

## GEN-1

DATA:														
		24-1 Generator (GEN-1)			AP-42 Emission Factors									
ENGINE TYPE		=	4SRB NG		(lb/MMBtu)									
FUEL HEAT CONTENT		=	1,416	Btu/Scf	Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs		
FUEL H2S CONTENT		=	10.00	ppmv	Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3		
MAXIMUM ENGINE HP		=	68	HP	2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2		
ENGINE OP HOURS		=	8,760	Hr	4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2		
ENGINE RATING		=	0.54	MMBtu/hr	4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2		
BRAKE-SPECIFIC FUEL CONSUMPTION		=	8,000	Btu/HP-hr	40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors							GWP		
CALCULATION BASIS		=	Controlled and Uncontrolled			Tables C-1 & C-2							N <sub>2</sub> O=	298
EMISSION FACTORS (EF)		MANUFACTURER'S EF			(kg/MMBtu)							CO <sub>2</sub> =	1	
												CH <sub>4</sub> =	25	

## 24-1 Flare

Data	Total	Separator Gas	Tank Gas	Pilot Gas	GWP (11/29/2013)	40 CFR Part 98 Sub C GHG Emission Factors (Table C-1)
Volume	12,701.740 scf/hr (Ind.)	300.0 Mscf/day	4.8 Mscf/day	0.0 Mscf/day	N <sub>2</sub> O= 298	
H <sub>2</sub> S mol%	0.0010% mol%	0.0010% mol%	0.0000% mol%	0.0000% mol%	CO <sub>2</sub> = 1	N <sub>2</sub> O= 0.0001 kg/MMBtu
Heat Content	1427.25 Btu/scf (Ind.)	1416.00 Btu/scf (Ind.)	2124.62 Btu/scf (Ind.)	2500.00 Btu/scf (Ind.)	CH <sub>4</sub> = 25	AP 42 Emissions Factors <sup>7</sup>
VOC MW	10.75 lb/lb-mol <sup>2</sup>	10.49 lb/lb-mol <sup>2</sup>	26.76 lb/lb-mol <sup>2</sup>	43.24 lb/lb-mol <sup>2</sup>		NO <sub>x</sub> = 0.068 lb/MMBtu
CO <sub>2</sub>	0.81% mol%	0.82% mol%	0.18% mol%	0.00% mol%		CO= 0.37 lb/MMBtu
CH <sub>4</sub>	61.80% mol%	62.31% mol%	30.03% mol%	0.00% mol%		PM <sub>10</sub> = 40 µg/L
C <sub>6</sub>	1.07 lb/lb-mol <sup>2</sup>	1.06 lb/lb-mol <sup>2</sup>	1.78 lb/lb-mol <sup>2</sup>	0.00 lb/lb-mol <sup>2</sup>		
OP Hours	8760 Hrs				(Ind. STP) scf/lbmol= 380.67	60 °F 14.65 psia
Destruction Eff	98.00% DRE	Heat Input	18.13 MMBtu/hr <sup>1</sup>		(EPA STP) scf/lbmol= 385.5	68 °F 14.696 psia

### Potential Flare Emission Calculations

Pollutants										
PM <sub>10</sub>	40 µg	12701.7 scf (Ind.)	2.2E-9 lb	8,760 Hr	1 Ton	28.31685 L	1.01 scf(EPA)			0.141 Tons
	L	Hr	µg	Year	2,000 Lb	scf (EPA)	1 scf(Ind.)	=		Year
SO <sub>2</sub>	168.3 Lb SO <sub>2</sub> <sup>4</sup>	12.702 MScf (Ind.)	0.001% H <sub>2</sub> S Mol%	8,760 Hr	1 Ton					0.092 Tons
	MScf (Ind.)	Hr		Year	2,000 Lb			=		Year
NO <sub>x</sub>	0.068 lb	18.129 MMBtu	8,760 Hr	1 Ton						5.399 Tons
	MMBtu	Hr	Year	2,000 Lb				=		Year
CO	0.37 lb	18.129 MMBtu	8,760 Hr	1 Ton						29.379 Tons
	MMBtu	Hr	Year	2,000 Lb				=		Year
VOC <sup>5</sup>	12,701.7 Scf (Ind.)	1 lb-mol	10.75 Lb VOC	8,760 Hr	1 Ton	2.00% Inv. DRE				31.422 Tons
	Hr	380.67 scf (Ind.)	Lb-Mole	Year	2,000 Lb			=		Year
HAPs <sup>6</sup>	12,701.7 Scf (Ind.)	1 lb-mol	1.07 Lb C <sub>6</sub>	8,760 Hr	1 Ton	2.00% Inv. DRE				3.140 Tons
	Hr	380.67 scf (Ind.)	Lb-Mole	Year	2,000 Lb			=		Year
CO <sub>2</sub> <sup>5,6</sup> of Combustion	98.00% DRE	1.11E+08 Scf (Ind.)	1.61 lb-mol CO <sub>2</sub> (stoich.)	1 lb-mol gas	44.01 lb CO <sub>2</sub>	1 Ton				10,132.14 Tons
	Yr		1 lb-mol gas (stoich.)	380.67 scf (Ind.)	lb-mole CO <sub>2</sub>	2,000 Lb		=		Year
CO <sub>2</sub> of Fuel	1.11E+08 Scf (Ind.)	0.81% mol% CO <sub>2</sub>	1 lb-mol	44.01 Lb CO <sub>2</sub>	1 Ton					52.09 Tons
	Yr		380.67 scf (Ind.)	Lb-mole	2,000 Lb			=		Year
N <sub>2</sub> O	0.001 M Ton	0.001427 MMBtu	12,701.7 Scf (Ind.)	0.0001 kg	8,760 Hr	1.1023 Tons				0.0175 Tons
	kg	Scf (Ind.)	Hr	MMBtu	Year	1 Metric Ton		=		Year
CH <sub>4</sub> Uncombusted	1.11E+08 Scf (Ind.)	2.00% Inv. DRE	61.80% mol% CH <sub>4</sub>	1 lb-mol	16.043 Lb CH <sub>4</sub>	1 Ton				28.98 Tons
	Yr			380.675 scf (Ind.)	Lb-mole	2,000 Lb		=		Year
Mass Sum	10,184.23 Tons		0.0175 Tons		28.98 Tons					10,213.22 Tons
	Year		Year		Year			=		Year
CO <sub>2</sub> e	10,184.23 TPY	X 1	0.0175 TPY	X 298	28.98 TP	X 25				10,913.91 Tons
	10,184.23 CO <sub>2</sub>		5.22 N <sub>2</sub> O		724.46 CH <sub>4</sub>			=		Year

<sup>1</sup> Rated Heat Capacity (MMBtu/Hr) = Flowrate (Scf/Hr) \* Heat Content (Btu/Scf) \* (MMBtu/10<sup>6</sup> Btu)

<sup>2</sup> VOC (Lb/Lb-mole) = Σ(Mole% of Each Compound) \* (1%/100) \* MW of Each Compound - See Flare GHG Spread Sheet for gas analysis

<sup>3</sup> Has to be maintained <500 lb/hr or 20 ppbv offsite concentration could potentially be exceeded

H<sub>2</sub>S (Lb/hr) = Volume (Scf/hr) \* (1 lb-mol/380.67) \* (H<sub>2</sub>S mol%) \* (34.08 Lb H<sub>2</sub>S/Lb-mol)

<sup>4</sup> SO<sub>2</sub> Conversion Factor 168.3 Lb SO<sub>2</sub>/MScf of Gas

= (1,000 Scf/MScf) \* (1Lb-Mole/380.67 Scf) \* (64.066 Lb SO<sub>2</sub>/Lb-Mole)

<sup>5</sup> Assuming the flare is 98% efficient

<sup>6</sup> Calculated using the gas analysis:

Σ Y<sub>j</sub> \* R<sub>j</sub> where, Y<sub>j</sub> = mole fraction of gas hydrocarbon constituents' j (such as methane, ethane, propane, carbon dioxide, etc.) and R<sub>j</sub> = number of carbon atoms in gas hydrocarbon constituent j: 1 for methane and carbon dioxide, 2 for ethane, 3 for propane, etc.

<sup>7</sup> Flare assumed to be "lightly smoking" in AP-42 table 13.5-1

<sup>8</sup> Hexane is a HAP. Assume Hexanes+ or Hexane are HAPS

## LIFT-2

DATA:					AP-42 Emission Factors									
13-11 Gas Lift (LIFT-2)					(lb/MMBtu)									
ENGINE TYPE	=	4SRB	NG	Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs			
FUEL HEAT CONTENT	=	1,462	Btu/Scf	Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3			
FUEL H2S CONTENT	=	4.00	ppmv	2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2			
MAXIMUM ENGINE HP	=	203	HP	4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2			
ENGINE OP HOURS	=	8,760	Hr	4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2			
ENGINE RATING	=	1.62	MMBtu/hr	40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors							GWP			
BRAKE-SPECIFIC FUEL CONSUMPTION	=	8,000	Btu/HP-hr	Tables C-1 & C-2							N <sub>2</sub> O=	298		
CALCULATION BASIS	=	Controlled and Uncontrolled		(kg/MMBtu)							CO <sub>2</sub> =	1		
EMISSION FACTORS (EF)		MANUFACTURER'S EF				N <sub>2</sub> O	CO <sub>2</sub>	CH <sub>4</sub>			CH <sub>4</sub> =	25		
		Uncontrolled	Controlled											
NO <sub>x</sub>	=	16.57	g/HP-hr	1	g/HP-hr	Diesel	0.0006	75.04	0.003					
CO	=	16.57	g/HP-hr	2	g/HP-hr	NG	0.0001	53.06	0.001					
VOC	=	0.12	g/HP-hr		g/HP-hr	LPG	0.0006	62.72	0.003					
CH <sub>2</sub> O	=	0.25	g/HP-hr		g/HP-hr	Propane	0.0006	61.46	0.003					
CH <sub>4</sub>	=	1.02	g/HP-hr		g/HP-hr									
Controlled and Uncontrolled 203 HP Engine Emissions Calculations														
PM	0.0095	Lb	1.62	MMBtu	8760 Hrs	1 Ton	S.F.			Uncontrolled	Controlled			
		MMBtu		Hr	Year	2000 Lb			=	0.07 Tons	0.07 Tons			
SO <sub>2</sub>	0.0006	lb	1.62	MMBtu	8760 Hrs	1 Ton	S.F.	4 ppmv S		0.00 Tons	0.00 Tons			
		MMBtu		Hr	Year	2000 Lb		3.44 ppmv S	=	Year	Year			
NO <sub>x</sub>	16.57	g	203.00	HP	1 Lb	8,760 Hr	1 Ton	S.F.		32.48 Tons	1.96 Tons			
		HP-Hr			453.6 g	Year	2000 Lb		=	Year	Year			
CO	16.57	g	203.00	HP	1 Lb	8,760 Hr	1 Ton	S.F.		32.48 Tons	3.92 Tons			
		HP-Hr			453.6 g	Year	2000 Lb		=	Year	Year			
VOC	0.12	g	203.00	HP	1 Lb	8,760 Hr	1 Ton	S.F.		0.24 Tons	0.24 Tons			
		HP-Hr			453.6 g	Year	2000 Lb		=	Year	Year			
CH <sub>2</sub> O	0.2500	g	203.00	HP	1 Lb	8,760 Hr	1 Ton	S.F.		0.49 Tons	0.49 Tons			
		HP-Hr			453.6 g	Year	2000 Lb		=	Year	Year			
non-CH <sub>2</sub> O HAPs	0.0120	lb	1.62	MMBtu		8,760 Hr	1 Ton	S.F.		0.09 Tons	0.09 Tons			
		MMBtu		Hr		Year	2000 Lb		=	Year	Year			
CO <sub>2</sub>	1.62	MMBtu	53.06	kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons			832.07 Tons	832.07 Tons			
		Hr		MMBtu		kg	Year	1 M Ton	=	Year	Year			
N <sub>2</sub> O	1.62	MMBtu	0.0001	kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons			0.00 Tons	0.00 Tons			
		Hr		MMBtu		kg	Year	1 M Ton	=	Year	Year			
CH <sub>4</sub>	1.02	g	203.000	HP	1 Lb	8,760 Hr	1 Ton			2.00 Tons	2.00 Tons			
		HP-Hr			453.6 g	Year	2000 Lbs		=	Year	Year			
Mass Sum	832.07	Tons					1.9994	Tons		834.07 Tons	834.07 Tons			
		Year	+		0.0016	Tons				Year	Year			
		CO <sub>2</sub>				Year		CH <sub>4</sub>						
CO <sub>2</sub> e	832.07	TPY*1			0.0016	TPY*298		1.999	TPY*25		882.53 Tons	882.53 Tons		
		Year	+		0.47			49.98			Year	Year		
		CO <sub>2</sub>				N <sub>2</sub> O		CH <sub>4</sub>						

<sup>1</sup> EPA AP-42 factors assume gas to have 2000 gr S/MMScf (at EPA STP). This equates to 3.44 ppmv S, assuming ideal gas. AP-42 factor can be corrected to sulfur value of facility gas by comparing actual sulfur values to EPA reference point. Assume ppmv H<sub>2</sub>S = ppmv S (true if H<sub>2</sub>S = TRS and TRS is entirely monosulfur compounds).

## GEN-2

DATA:														
		13-11 Generator (GEN-2)			AP-42 Emission Factors									
ENGINE TYPE		4SRB NG			(lb/MMBtu)									
FUEL HEAT CONTENT		1,462 Btu/Scf			Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs		
FUEL H2S CONTENT		4.00 ppmv			Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3		
MAXIMUM ENGINE HP		68 HP			2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2		
ENGINE OP HOURS		8,760 Hr			4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2		
ENGINE RATING		0.54 MMBtu/hr			4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2		
BRAKE-SPECIFIC FUEL CONSUMPTION		8,000 Btu/HP-hr			40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors							GWP		
CALCULATION BASIS		Controlled and Uncontrolled			Tables C-1 & C-2							N <sub>2</sub> O= 298		
EMISSION FACTORS (EF)		MANUFACTURER'S EF			(kg/MMBtu)							CO <sub>2</sub> = 1		
												CH <sub>4</sub> = 25		
						N <sub>2</sub> O	CO <sub>2</sub>	CH <sub>4</sub>						
NO <sub>x</sub>		14.4 g/HP-hr			Diesel	0.0006	75.04	0.003						
CO		16.3 g/HP-hr			NG	0.0001	53.06	0.001						
VOC		3 g/HP-hr			LPG	0.0006	62.72	0.003						
CH <sub>2</sub> O		0.07 g/HP-hr			Propane	0.0006	61.46	0.003						
CH <sub>4</sub>		g/HP-hr												
Controlled and Uncontrolled 68 HP Engine Emissions Calculations														
Uncontrolled Controlled														
PM	0.0095 Lb	0.54 MMBtu	8760 Hrs	1 Ton	S.F.						0.02 Tons	0.02 Tons		
	MMBtu	Hr	Year	2000 Lb						Year	Year			
SO <sub>2</sub>	0.0006 lb	0.54 MMBtu	8760 Hrs	1 Ton	S.F.	4 ppmv S					0.00 Tons	0.00 Tons		
	MMBtu	Hr	Year	2000 Lb	3.44 ppmv S					Year	Year			
NO <sub>x</sub>	14.4 g	68.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					9.46 Tons	9.46 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
CO	16.3 g	68.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					10.70 Tons	10.70 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
VOC	3.00 g	68.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					1.97 Tons	1.97 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
CH <sub>2</sub> O	0.0700 g	68.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					0.05 Tons	0.05 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
non-CH <sub>2</sub> O HAPs	0.0120 lb	0.54 MMBtu		8,760 Hr	1 Ton	S.F.					0.03 Tons	0.03 Tons		
	MMBtu	Hr		Year	2000 Lb						Year	Year		
CO <sub>2</sub>	0.54 MMBtu	53.06 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons						278.72 Tons	278.72 Tons		
	Hr	MMBtu	kg	Year	1 M Ton						Year	Year		
N <sub>2</sub> O	0.54 MMBtu	0.0001 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons						0.00 Tons	0.00 Tons		
	Hr	MMBtu	kg	Year	1 M Ton						Year	Year		
CH <sub>4</sub>	0.54 MMBtu	0.001 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons						0.01 Tons	0.01 Tons		
	Hr	MMBtu	kg	Year	1 M Ton						Year	Year		
Mass Sum	278.72 Tons	+	0.0005 Tons	+	0.0053 Tons						278.73 Tons	278.73 Tons		
	Year		Year		Year						Year	Year		
CO <sub>2</sub> e	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>									
	278.72 TPY*1		0.0005 TPY*298		0.005 TPY*25						279.01 Tons	279.01 Tons		
	278.72	+	0.16	+	0.13						Year	Year		
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>									

<sup>1</sup> EPA AP-42 factors assume gas to have 2000 gr S/MMScf (at EPA STP). This equates to 3.44 ppmv S, assuming ideal gas. AP-42 factor can be corrected to sulfur value of facility gas by comparing actual sulfur values to EPA reference point. Assume ppmv H<sub>2</sub>S = ppmv S (true if H<sub>2</sub>S = TRS and TRS is entirely monosulfur compounds).



### LIFT-3

DATA:													
		13-15 Power Oil (LIFT-3)		AP-42 Emission Factors									
ENGINE TYPE	=	4SRB NG		(lb/MMBtu)									
FUEL HEAT CONTENT	=	1,359	Btu/Scf	Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs		
FUEL H2S CONTENT	=	4.50	ppmv	Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3		
MAXIMUM ENGINE HP	=	163	HP	2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2		
ENGINE OP HOURS	=	8,760	Hr	4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2		
ENGINE RATING	=	1.30	MMBtu/hr	4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2		
BRAKE-SPECIFIC FUEL CONSUMPTION	=	8,000	Btu/HP-hr	40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors							GWP		
CALCULATION BASIS	=	Uncontrolled		Tables C-1 & C-2							N <sub>2</sub> O=	298	
EMISSION FACTORS (EF)		MANUFACTURER'S EF		(kg/MMBtu)							CO <sub>2</sub> =	1	
		Uncontrolled	Controlled		N <sub>2</sub> O	CO <sub>2</sub>	CH <sub>4</sub>				CH <sub>4</sub> =	25	
NO <sub>x</sub>	=	13.5	g/HP-hr	0.5	g/HP-hr	Diesel	0.0006	75.04	0.003				
CO	=	17	g/HP-hr	2	g/HP-hr	NG	0.0001	53.06	0.001				
VOC	=	0.35	g/HP-hr		g/HP-hr	LPG	0.0006	62.72	0.003				
CH <sub>2</sub> O	=	0.05	g/HP-hr		g/HP-hr	Propane	0.0006	61.46	0.003				
CH <sub>4</sub>	=		g/HP-hr		g/HP-hr								
Uncontrolled 163 HP Engine Emissions Calculations													
												Uncontrolled	
PM	0.0095 Lb	1.30 MMBtu	8760 Hrs	1 Ton	S.F.							0.05 Tons	
	MMBtu	Hr	Year	2000 Lb								Year	
SO <sub>2</sub>	0.0006 lb	1.30 MMBtu	8760 Hrs	1 Ton	S.F.	4.5 ppmv S						0.00 Tons	
	MMBtu	Hr	Year	2000 Lb		3.44 ppmv S						Year	
NO <sub>x</sub>	13.5 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.						21.25 Tons	
	HP-Hr		453.6 g	Year	2000 Lb							Year	
CO	17 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.						26.76 Tons	
	HP-Hr		453.6 g	Year	2000 Lb							Year	
VOC	0.35 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.						0.55 Tons	
	HP-Hr		453.6 g	Year	2000 Lb							Year	
CH <sub>2</sub> O	0.0500 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.						0.08 Tons	
	HP-Hr		453.6 g	Year	2000 Lb							Year	
non-CH <sub>2</sub> O HAPs	0.0120 lb	1.30 MMBtu		8,760 Hr	1 Ton	S.F.						0.07 Tons	
	MMBtu	Hr		Year	2000 Lb							Year	
CO <sub>2</sub>	1.30 MMBtu	53.06 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons							668.12 Tons	
	Hr	MMBtu	kg	Year	1 M Ton							Year	
N <sub>2</sub> O	1.30 MMBtu	0.0001 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons							0.00 Tons	
	Hr	MMBtu	kg	Year	1 M Ton							Year	
CH <sub>4</sub>	1.30 MMBtu	0.001 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons							0.01 Tons	
	Hr	MMBtu	kg	Year	1 M Ton							Year	
Mass Sum	668.12 Tons	+	0.0013 Tons	+	0.0126 Tons							668.13 Tons	
	Year		Year		Year							Year	
CO <sub>2</sub> e	668.12 TPY*1		0.0013 TPY*298	+	0.013 TPY*25							668.81 Tons	
	668.12	+	0.38	+	0.31							Year	
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>								

<sup>1</sup> EPA AP-42 factors assume gas to have 2000 gr S/MMScf (at EPA STP). This equates to 3.44 ppmv S, assuming ideal gas. AP-42 factor can be corrected to sulfur value of facility gas by comparing actual sulfur values to EPA reference point. Assume ppmv H<sub>2</sub>S = ppmv S (true if H<sub>2</sub>S = TRS and TRS is entirely monosulfur compounds).

### GEN-3

DATA:														
		13-15 generator (GEN-3)			AP-42 Emission Factors									
ENGINE TYPE		4SRB NG			(lb/MMBtu)									
FUEL HEAT CONTENT		1,359 Btu/Scf			Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs		
FUEL H2S CONTENT		4.50 ppmv			Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3		
MAXIMUM ENGINE HP		145 HP			2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2		
ENGINE OP HOURS		8,760 Hr			4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2		
ENGINE RATING		1.16 MMBtu/hr			4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2		
BRAKE-SPECIFIC FUEL CONSUMPTION		8,000 Btu/HP-hr			40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors							GWP		
CALCULATION BASIS		Controlled and Uncontrolled			Tables C-1 & C-2							N <sub>2</sub> O= 298		
EMISSION FACTORS (EF)		MANUFACTURER'S EF			(kg/MMBtu)							CO <sub>2</sub> = 1		
												CH <sub>4</sub> = 25		

## LIFT-4

DATA:														
18-13 Power Oil					AP-42 Emission Factors									
ENGINE TYPE		=	4SRB NG		(lb/MMBtu)									
FUEL HEAT CONTENT		=	1,412 Btu/Scf		Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs		
FUEL H2S CONTENT		=	6.2 ppmv		Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3		
MAXIMUM ENGINE HP		=	163 HP		2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2		
ENGINE OP HOURS		=	8,760 Hr		4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2		
ENGINE RATING		=	1.30 MMBtu/hr		4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2		
BRAKE-SPECIFIC FUEL CONSUMPTION		=	8,000 Btu/HP-hr		40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors							GWP		
CALCULATION BASIS		=	Controlled and Uncontrolled		Tables C-1 & C-2							N <sub>2</sub> O=	298	
EMISSION FACTORS (EF)		MANUFACTURER'S EF			(kg/MMBtu)							CO <sub>2</sub> =	1	
												CH <sub>4</sub> =	25	
						N <sub>2</sub> O	CO <sub>2</sub>	CH <sub>4</sub>						
NO <sub>x</sub>		=	13.5 g/HP-hr	0.5 g/HP-hr	Diesel	0.0006	75.04	0.003						
CO		=	17 g/HP-hr	2 g/HP-hr	NG	0.0001	53.06	0.001						
VOC		=	0.35 g/HP-hr	g/HP-hr	LPG	0.0006	62.72	0.003						
CH <sub>2</sub> O		=	0.05 g/HP-hr	g/HP-hr	Propane	0.0006	61.46	0.003						
CH <sub>4</sub>		=	g/HP-hr	g/HP-hr										
Controlled and Uncontrolled 163 HP Engine Emissions Calculations														
Uncontrolled Controlled														
PM	0.0095 Lb	1.30 MMBtu	8760 Hrs	1 Ton	S.F.						0.05 Tons	0.05 Tons		
	MMBtu	Hr	Year	2000 Lb							Year	Year		
SO <sub>2</sub>	0.0006 lb	1.30 MMBtu	8760 Hrs	1 Ton	S.F.	6.16667 ppmv S					0.01 Tons	0.01 Tons		
	MMBtu	Hr	Year	2000 Lb		3.44 ppmv S					Year	Year		
NO <sub>x</sub>	13.5 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					21.25 Tons	0.79 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
CO	17 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					26.76 Tons	3.15 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
VOC	0.35 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					0.55 Tons	0.55 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
CH <sub>2</sub> O	0.0500 g	163.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.					0.08 Tons	0.08 Tons		
	HP-Hr		453.6 g	Year	2000 Lb						Year	Year		
non-CH <sub>2</sub> O HAPs	0.0120 lb	1.30 MMBtu		8,760 Hr	1 Ton	S.F.					0.07 Tons	0.07 Tons		
	MMBtu	Hr		Year	2000 Lb						Year	Year		
CO <sub>2</sub>	1.30 MMBtu	53.06 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons						668.12 Tons	668.12 Tons		
	Hr	MMBtu	kg	Year	1 M Ton						Year	Year		
N <sub>2</sub> O	1.30 MMBtu	0.0001 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons						0.00 Tons	0.00 Tons		
	Hr	MMBtu	kg	Year	1 M Ton						Year	Year		
CH <sub>4</sub>	1.30 MMBtu	0.001 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons						0.01 Tons	0.01 Tons		
	Hr	MMBtu	kg	Year	1 M Ton						Year	Year		
Mass Sum	668.12 Tons	+	0.0013 Tons	+	0.0126 Tons						668.13 Tons	668.13 Tons		
	Year		Year		Year						Year	Year		
CO <sub>2</sub> e	668.12 TYPY*1		0.0013 TYPY*298	+	0.013 TYPY*25						668.81 Tons	668.81 Tons		
	668.12	+	0.38	+	0.31						Year	Year		
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>									

## GEN-4

DATA:																
18-13 Generator (GEN-4)					AP-42 Emission Factors											
ENGINE TYPE = 4SRB NG					(lb/MMBtu)											
FUEL HEAT CONTENT = 1,412 Btu/Scf					Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs				
FUEL H2S CONTENT = 6.17 ppmv					Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3				
MAXIMUM ENGINE HP = 68 HP					2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2				
ENGINE OP HOURS = 8,760 Hr					4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2				
ENGINE RATING = 0.54 MMBtu/hr					4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2				
BRAKE-SPECIFIC FUEL CONSUMPTION = 8,000 Btu/HP-hr					40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors											
CALCULATION BASIS = Controlled and Uncontrolled					Tables C-1 & C-2											
EMISSION FACTORS (EF)					MANUFACTURER'S EF											
					Uncontrolled					Controlled						
NO <sub>x</sub>		=	14.4 g/HP-hr	0.5 g/HP-hr												
CO		=	16.3 g/HP-hr	1 g/HP-hr												
VOC		=	0.5 g/HP-hr	g/HP-hr												
CH <sub>2</sub> O		=	0.1 g/HP-hr	g/HP-hr												
CH <sub>4</sub>		=	g/HP-hr	g/HP-hr												
Controlled and Uncontrolled 68 HP Engine Emissions Calculations																
Uncontrolled															Controlled	
PM	0.0095 Lb		0.54 MMBtu	8760 Hrs	1 Ton	S.F.							0.02 Tons	0.02 Tons		
	MMBtu		Hr	Year	2000 Lb								Year	Year		
SO <sub>2</sub>	0.0006 lb		0.54 MMBtu	8760 Hrs	1 Ton	S.F.	6.16667 ppmv S						0.00 Tons	0.00 Tons		
	MMBtu		Hr	Year	2000 Lb		3.44 ppmv S						Year	Year		
NO <sub>x</sub>	14.4 g		68.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.						9.46 Tons	0.33 Tons		
	HP-Hr			453.6 g	Year	2000 Lb							Year	Year		
CO	16.3 g		68.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.						10.70 Tons	0.66 Tons		
	HP-Hr			453.6 g	Year	2000 Lb							Year	Year		
VOC	0.50 g		68.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.						0.33 Tons	0.33 Tons		
	HP-Hr			453.6 g	Year	2000 Lb							Year	Year		
CH <sub>2</sub> O	0.1000 g		68.00 HP	1 Lb	8,760 Hr	1 Ton	S.F.						0.07 Tons	0.07 Tons		
	HP-Hr			453.6 g	Year	2000 Lb							Year	Year		
non-CH <sub>2</sub> O HAPs	0.0120 lb		0.54 MMBtu		8,760 Hr	1 Ton	S.F.						0.03 Tons	0.03 Tons		
	MMBtu		Hr		Year	2000 Lb							Year	Year		
CO <sub>2</sub>	0.54 MMBtu		53.06 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons							278.72 Tons	278.72 Tons		
	Hr		MMBtu	kg	Year	1 M Ton							Year	Year		
N <sub>2</sub> O	0.54 MMBtu		0.0001 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons							0.00 Tons	0.00 Tons		
	Hr		MMBtu	kg	Year	1 M Ton							Year	Year		
CH <sub>4</sub>	0.54 MMBtu		0.001 kg	0.001 Metric Ton	8,760 Hr	1.10231 Tons							0.01 Tons	0.01 Tons		
	Hr		MMBtu	kg	Year	1 M Ton							Year	Year		
Mass Sum	278.72 Tons		+	0.0005 Tons	+	0.0053 Tons							278.73 Tons	278.73 Tons		
	Year			Year		Year							Year	Year		
	CO <sub>2</sub>			N <sub>2</sub> O		CH <sub>4</sub>										
CO <sub>2</sub> e	278.72 TPY*1		0.0005 TPY*298	+	0.005 TPY*25								279.01 Tons	279.01 Tons		
	278.72		+	0.16	+	0.13							Year	Year		
	CO <sub>2</sub>			N <sub>2</sub> O		CH <sub>4</sub>										

<sup>1</sup> EPA AP-42 factors assume gas to have 2000 gr S/MMScf (at EPA STP). This equates to 3.44 ppmv S, assuming ideal gas. AP-42 factor can be corrected to sulfur value of facility gas by comparing actual sulfur values to EPA reference point. Assume ppmv H<sub>2</sub>S = ppmv S (true if H<sub>2</sub>S = TRS and TRS is entirely monosulfur compounds).

## LIFT-5

DATA:														
		14-XX Power Oil (LIFT-4)			AP-42 Emission Factors									
ENGINE TYPE		=	4SRB NG		(lb/MMBtu)									
FUEL HEAT CONTENT		=	1,412 Btu/Scf		Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs		
FUEL H2S CONTENT		=	6.2 ppmv		Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3		
MAXIMUM ENGINE HP		=	163 HP		2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2		
ENGINE OP HOURS		=	8,760 Hr		4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2		
ENGINE RATING		=	1.30 MMBtu/hr		4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2		
BRAKE-SPECIFIC FUEL CONSUMPTION		=	8,000 Btu/HP-hr		40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors									
CALCULATION BASIS		=	Controlled and Uncontrolled		Tables C-1 & C-2									
EMISSION FACTORS (EF)		MANUFACTURER'S EF			(kg/MMBtu)									

## GEN-5

DATA:															
		14-XX Generator (GEN-5)			AP-42 Emission Factors										
ENGINE TYPE	=	4SRB		NG	(lb/MMBtu)										
FUEL HEAT CONTENT	=	1,412	Btu/Scf		Type	PM	SO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub>	CO	VOC	CH <sub>2</sub> O	Other HAPs			
FUEL H2S CONTENT	=	6.17	ppmv		Diesel	3.10E-1	[By Mass]	4.41E+0	9.50E-1	3.50E-1	1.18E-3	2.69E-3			
MAXIMUM ENGINE HP	=	68	HP		2SLB	3.84E-2	5.88E-4	3.17E+0	3.86E-1	1.20E-1	5.52E-2	2.53E-2			
ENGINE OP HOURS	=	8,760	Hr		4SLB	7.71E-5	5.88E-4	4.08E+0	3.17E-1	1.18E-1	5.28E-2	2.10E-2			
ENGINE RATING	=	0.54	MMBtu/hr		4SRB	9.50E-3	5.88E-4	2.27E+0	3.72E+0	2.96E-2	2.05E-2	1.20E-2			
BRAKE-SPECIFIC FUEL CONSUMPTION	=	8,000	Btu/HP-hr		40 CFR Part 98 Subpart C Greenhouse Gas Emission Factors							GWP			
CALCULATION BASIS	=	Controlled and Uncontrolled			Tables C-1 & C-2							N <sub>2</sub> O=	298		
EMISSION FACTORS (EF)		MANUFACTURER'S EF			(kg/MMBtu)							CO <sub>2</sub> =	1		
		Uncontrolled	Controlled			N <sub>2</sub> O	CO <sub>2</sub>	CH <sub>4</sub>				CH <sub>4</sub> =	25		
NO <sub>x</sub>	=	14.4	g/HP-hr	0.5	g/HP-hr	Diesel	0.0006	75.04	0.003						
CO	=	16.3	g/HP-hr	1	g/HP-hr	NG	0.0001	53.06	0.001						
VOC	=	0.5	g/HP-hr		g/HP-hr	LPG	0.0006	62.72	0.003						
CH <sub>2</sub> O	=	0.1	g/HP-hr		g/HP-hr	Propane	0.0006	61.46	0.003						
CH <sub>4</sub>	=		g/HP-hr		g/HP-hr										
Controlled and Uncontrolled 68 HP Engine Emissions Calculations															
Uncontrolled															
PM	0.0095	Lb	0.54	MMBtu	8760 Hrs	1 Ton	S.F.					0.02	Tons	0.02	Tons
		MMBtu		Hr	Year	2000 Lb							Year		Year
SO <sub>2</sub>	0.0006	lb	0.54	MMBtu	8760 Hrs	1 Ton	S.F.	6.16667	ppmv S			0.00	Tons	0.00	Tons
		MMBtu		Hr	Year	2000 Lb			3.44	ppmv S			Year		Year
NO <sub>x</sub>	14.4	g	68.00	HP	1 Lb	8,760 Hr	1 Ton	S.F.				9.46	Tons	0.33	Tons
		HP-Hr			453.6 g	Year	2000 Lb						Year		Year
CO	16.3	g	68.00	HP	1 Lb	8,760 Hr	1 Ton	S.F.				10.70	Tons	0.66	Tons
		HP-Hr			453.6 g	Year	2000 Lb						Year		Year
VOC	0.50	g	68.00	HP	1 Lb	8,760 Hr	1 Ton	S.F.				0.33	Tons	0.33	Tons
		HP-Hr			453.6 g	Year	2000 Lb						Year		Year
CH <sub>2</sub> O	0.1000	g	68.00	HP	1 Lb	8,760 Hr	1 Ton	S.F.				0.07	Tons	0.07	Tons
		HP-Hr			453.6 g	Year	2000 Lb						Year		Year
non-CH <sub>2</sub> O HAPs	0.0120	lb	0.54	MMBtu		8,760 Hr	1 Ton	S.F.				0.03	Tons	0.03	Tons
		MMBtu		Hr		Year	2000 Lb						Year		Year
CO <sub>2</sub>	0.54	MMBtu	53.06	kg	0.001	Metric Ton	8,760 Hr	1.10231	Tons			278.72	Tons	278.72	Tons
		Hr		MMBtu		kg	Year		1 M Ton				Year		Year
N <sub>2</sub> O	0.54	MMBtu	0.0001	kg	0.001	Metric Ton	8,760 Hr	1.10231	Tons			0.00	Tons	0.00	Tons
		Hr		MMBtu		kg	Year		1 M Ton				Year		Year
CH <sub>4</sub>	0.54	MMBtu	0.001	kg	0.001	Metric Ton	8,760 Hr	1.10231	Tons			0.01	Tons	0.01	Tons
		Hr		MMBtu		kg	Year		1 M Ton				Year		Year
Mass Sum	278.72	Tons	+	0.0005	Tons	+	0.0053	Tons				278.73	Tons	278.73	Tons
		Year			Year			Year					Year		Year
CO <sub>2</sub> e	278.72	TPY*1		0.0005	TPY*298	+	0.005	TPY*25				279.01	Tons	279.01	Tons
	278.72		+	0.16		+	0.13						Year		Year
		CO <sub>2</sub>			N <sub>2</sub> O			CH <sub>4</sub>							

<sup>1</sup> EPA AP-42 factors assume gas to have 2000 gr S/MMScf (at EPA STP). This equates to 3.44 ppmv S, assuming ideal gas. AP-42 factor can be corrected to sulfur value of facility gas by comparing actual sulfur values to EPA reference point. Assume ppmv H<sub>2</sub>S = ppmv S (true if H<sub>2</sub>S = TRS and TRS is entirely monosulfur compounds).



## Heater Treater at 24-1

<b>Data:</b>					<b>AP-42 EF (Propane)</b>	Based on NG with Btu/Content of 1020		
H <sub>2</sub> S mol%	0.00%	mol%			PM= 7.6 Lb/MMScf		<b>GWP*</b>	*Revised 11/29/2013
Op Hours	8760	Hrs			NO <sub>x</sub> = 150 Lb/MMScf		N <sub>2</sub> O= 298	
Heat Content	2,500	Btu/scf (Ind.)			CO= 84 Lb/MMScf		CO <sub>2</sub> = 1	
Flowrate	0.200	MScf/Hr (Ind.)			VOC= 5.5 Lb/MMScf		CH <sub>4</sub> = 25	
Heat Input	500,000	Btu/hr			HAP= 1.89 Lb/MMScf			
					SO <sub>2</sub> = 0.60 Lb/MMScf			
Use btu/scf(EPA) for PM, NO <sub>x</sub> , CO, VOC. Factors for EPA STP (also ADEM STP). SO <sub>2</sub> factor already for Industry STP (from Al. Oil & Gas Board)					<b>(Table C-1 &amp; C-2)</b> 40 CFR Part 98 Sub C GHG Emission Factors for C <sub>3</sub>		<b>(Table C-1 &amp; C-2)</b> 40 CFR Part 98 Sub C GHG Emission Factors for C <sub>1</sub>	
Ind. STP:	60 °F	14.65 psia			N <sub>2</sub> O= 0.0006 kg/MMBtu		N <sub>2</sub> O= 0.0001 kg/MMBtu	
EPA STP:	68 °F	14.696 psia			CO <sub>2</sub> = 61.46 kg/MMBtu		CO <sub>2</sub> = 53.06 kg/MMBtu	
Heat Content	2,470	Btu/scf (EPA)			CH <sub>4</sub> = 0.003 kg/MMBtu		CH <sub>4</sub> = 0.001 kg/MMBtu	
Fuel HHV Correction Factor	2.421							

### Heater Emission Calculations

Pollutants									
<b>PM</b>	7.6 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421			<b>0.016 Tons</b>
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb		=		<b>Year</b>
<b>SO<sub>2</sub></b>	0.60 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421			<b>0.001 Tons</b>
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb		=		<b>Year</b>
<b>NO<sub>x</sub></b>	150 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421			<b>0.322 Tons</b>
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb		=		<b>Year</b>
<b>CO</b>	84 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421			<b>0.180 Tons</b>
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb		=		<b>Year</b>
<b>VOC</b>	5.5 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421			<b>0.012 Tons</b>
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb		=		<b>Year</b>
<b>HAP</b>	1.89 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421			<b>0.004 Tons</b>
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb		=		<b>Year</b>
<b>CO<sub>2</sub></b>	0.5 MMBtu	61.46 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons				<b>296.73 Tons</b>
	Hr	MMBtu	kg	Year	1 Metric Ton		=		<b>Year</b>
<b>N<sub>2</sub>O</b>	0.5 MMBtu	0.0006 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons				<b>0.00290 Tons</b>
	Hr	MMBtu	kg	Year	1 Metric Ton		=		<b>Year</b>
<b>CH<sub>4</sub></b>	0.5 MMBtu	0.003 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons				<b>0.01448 Tons</b>
	Hr	MMBtu	kg	Year	1 Metric Ton		=		<b>Year</b>
<b>Mass Sum</b>	296.73 Tons	+	0.0029 Tons	+	0.0145 Tons				<b>296.75 Tons</b>
	Year		Year		Year		=		<b>Year</b>
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				
<b>CO<sub>2</sub>e</b>	296.73 TPY	X 1	0.0029 TPY	X 298	0.0145 TPY	X 25			<b>297.96 Tons</b>
	296.73	+	0.86	+	0.36		=		<b>Year</b>
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				

<sup>1</sup> AP-42 emission factors taken from Chapter 1.4. Based on natural gas with 1020 btu/scf, and corrected in calculations. From Chapter 1.5, propane emission factors are equivalent on a heat basis to methane factors, except the NO<sub>x</sub> factor is 1.5x higher.

## Line Heater at 24-1

<b>Data:</b>			<b>AP-42 EF (Propane)</b>			Based on NG with Btu/Content of 1020		
H <sub>2</sub> S mol%	0.00%	mol%	PM=	7.6	Lb/MMScf	<b>GWP*</b>		*Revised 11/29/2013
Op Hours	8760	Hrs	NO <sub>x</sub> =	150	Lb/MMScf	N <sub>2</sub> O=	298	
Heat Content	2,500	Btu/scf (Ind.)	CO=	84	Lb/MMScf	CO <sub>2</sub> =	1	
Flowrate	0.300	MScf/Hr (Ind.)	VOC=	5.5	Lb/MMScf	CH <sub>4</sub> =	25	
Heat Input	750,000	Btu/hr	HAP=	1.89	Lb/MMScf			
			SO <sub>2</sub> =	0.60	Lb/MMScf			
Use btu/scf(EPA) for PM, NO <sub>x</sub> , CO, VOC. Factors for EPA STP (also ADEM STP). SO <sub>2</sub> factor already for Industry STP (from Al. Oil & Gas Board)			<b>(Table C-1 &amp; C-2)</b> <b>40 CFR Part 98 Sub C GHG Emission Factors for C<sub>3</sub></b>			<b>(Table C-1 &amp; C-2)</b> <b>40 CFR Part 98 Sub C GHG Emission Factors for C<sub>1</sub></b>		
Ind. STP:	60 °F	14.65 psia	N <sub>2</sub> O=	0.0006	kg/MMBtu	N <sub>2</sub> O=	0.0001	kg/MMBtu
EPA STP:	68 °F	14.696 psia	CO <sub>2</sub> =	61.46	kg/MMBtu	CO <sub>2</sub> =	53.06	kg/MMBtu
Heat Content	2,470	Btu/scf (EPA)	CH <sub>4</sub> =	0.003	kg/MMBtu	CH <sub>4</sub> =	0.001	kg/MMBtu
Fuel HHV Correction Factor	2.421							
<b>Heater Emission Calculations</b>								
Pollutants								
PM	7.6 Lb	0.750 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421	=	0.024 Tons
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb			Year
SO <sub>2</sub>	0.60 Lb	0.750 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421	=	0.002 Tons
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb			Year
NO <sub>x</sub>	150 Lb	0.750 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421	=	0.483 Tons
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb			Year
CO	84 Lb	0.750 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421	=	0.271 Tons
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb			Year
VOC	5.5 Lb	0.750 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421	=	0.018 Tons
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb			Year
HAP	1.89 Lb	0.750 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	2.421	=	0.006 Tons
	MMScf (EPA)	Hr	2,470 Btu	Year	2,000 Lb			Year
CO <sub>2</sub>	0.75 MMBtu	61.46 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons	=	445.10 Tons	
	Hr	MMBtu	kg	Year	1 Metric Ton		Year	
N <sub>2</sub> O	0.75 MMBtu	0.0006 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons	=	0.00435 Tons	
	Hr	MMBtu	kg	Year	1 Metric Ton		Year	
CH <sub>4</sub>	0.75 MMBtu	0.003 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons	=	0.02173 Tons	
	Hr	MMBtu	kg	Year	1 Metric Ton		Year	
Mass Sum	445.10 Tons	+	0.0043 Tons	+	0.0217 Tons	=	445.13 Tons	
	Year		Year		Year		Year	
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>			
CO <sub>2</sub> e	445.10 TPY	X 1	0.0043 TPY	X 298	0.0217 TPY	X 25	=	446.94 Tons
	445.10	+	1.29	+	0.54	Year		
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>			

<sup>1</sup> AP-42 emission factors taken from Chapter 1.4. Based on natural gas with 1020 btu/scf, and corrected in calculations. From Chapter 1.5, propane emission factors are equivalent on a heat basis to methane factors, except the NO<sub>x</sub> factor is 1.5x higher.



## Heater Treater at 13-11

<b>Data:</b>			<b>AP-42 EF (NG)</b>		Based on NG with Btu/Content of 1020	
H <sub>2</sub> S mol%	0.00%	mol%	PM=	7.6 Lb/MMScf	<b>GWP*</b>	*Revised 11/29/2013
Op Hours	8760	Hrs	NO <sub>x</sub> =	100 Lb/MMScf		
Heat Content	1,462	Btu/scf (Ind.)	CO=	84 Lb/MMScf	N <sub>2</sub> O=	298
Flowrate	0.342	MScf/Hr (Ind.)	VOC=	5.5 Lb/MMScf	CO <sub>2</sub> =	1
Heat Input	500,000	Btu/hr	HAP=	1.89 Lb/MMScf	CH <sub>4</sub> =	25
			SO <sub>2</sub> =	0.60 Lb/MMScf		
Use btu/scf(EPA) for PM, NO <sub>x</sub> , CO, VOC. Factors for EPA STP (also ADEM STP). SO <sub>2</sub> factor already for Industry STP (from Al. Oil & Gas Board)			<b>(Table C-1 &amp; C-2)</b> 40 CFR Part 98 Sub C GHG Emission Factors for C <sub>3</sub>		<b>(Table C-1 &amp; C-2)</b> 40 CFR Part 98 Sub C GHG Emission Factors for C <sub>1</sub>	
Ind. STP:	60 °F	14.65 psia	N <sub>2</sub> O=	0.0006 kg/MMBtu	N <sub>2</sub> O=	0.0001 kg/MMBtu
EPA STP:	68 °F	14.696 psia	CO <sub>2</sub> =	61.46 kg/MMBtu	CO <sub>2</sub> =	53.06 kg/MMBtu
Heat Content	1,444	Btu/scf (EPA)	CH <sub>4</sub> =	0.003 kg/MMBtu	CH <sub>4</sub> =	0.001 kg/MMBtu
Fuel HHV Correction Factor	1.416					

### Heater Emission Calculations

Pollutants									
<b>PM</b>	7.6 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.016 Tons	
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb			Year	
<b>SO<sub>2</sub></b>	0.60 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.001 Tons	
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb			Year	
<b>NO<sub>x</sub></b>	100 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.215 Tons	
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb			Year	
<b>CO</b>	84 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.180 Tons	
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb			Year	
<b>VOC</b>	5.5 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.012 Tons	
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb			Year	
<b>HAP</b>	1.89 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.004 Tons	
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb			Year	
<b>CO<sub>2</sub></b>	0.5 MMBtu	53.06 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons		=	256.18 Tons	
	Hr	MMBtu	kg	Year	1 Metric Ton			Year	
<b>N<sub>2</sub>O</b>	0.5 MMBtu	0.0001 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons		=	0.00048 Tons	
	Hr	MMBtu	kg	Year	1 Metric Ton			Year	
<b>CH<sub>4</sub></b>	0.5 MMBtu	0.001 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons		=	0.00483 Tons	
	Hr	MMBtu	kg	Year	1 Metric Ton			Year	
<b>Mass Sum</b>	256.18 Tons	+	0.0005 Tons	+	0.0048 Tons		=	256.18 Tons	
	Year		Year		Year			Year	
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				
<b>CO<sub>2</sub>e</b>	256.18 TPY	X 1	0.0005 TPY	X 298	0.0048 TPY	X 25	=	256.44 Tons	
	256.18	+	0.14	+	0.12			Year	
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				

<sup>1</sup> AP-42 emission factors taken from Chapter 1.4. Based on natural gas with 1020 btu/scf, and corrected in calculations. From Chapter 1.5, propane emission factors are equivalent on a heat basis to methane factors, except the NO<sub>x</sub> factor is 1.5x higher.

## Heater Treater 13-15

<b>Data:</b>			<b>AP-42 EF (NG)</b>		Based on NG with Btu/Content of 1020	
H <sub>2</sub> S mol%	0.00%	mol%	PM=	7.6 Lb/MMScf	<b>GWP*</b>	*Revised 11/29/2013
Op Hours	8760	Hrs	NO <sub>x</sub> =	100 Lb/MMScf		
Heat Content	1,359	Btu/scf (Ind.)	CO=	84 Lb/MMScf	N <sub>2</sub> O=	298
Flowrate	0.368	MScf/Hr (Ind.)	VOC=	5.5 Lb/MMScf	CO <sub>2</sub> =	1
Heat Input	500,000	Btu/hr	HAP=	1.89 Lb/MMScf	CH <sub>4</sub> =	25
			SO <sub>2</sub> =	0.60 Lb/MMScf		
Use btu/scf(EPA) for PM, NO <sub>x</sub> , CO, VOC. Factors for EPA STP (also ADEM STP). SO <sub>2</sub> factor already for Industry STP (from Al. Oil & Gas Board)			<b>(Table C-1 &amp; C-2)</b> 40 CFR Part 98 Sub C GHG Emission Factors for C <sub>3</sub>		<b>(Table C-1 &amp; C-2)</b> 40 CFR Part 98 Sub C GHG Emission Factors for C <sub>1</sub>	
Ind. STP:	60 °F	14.65 psia	N <sub>2</sub> O=	0.0006 kg/MMBtu	N <sub>2</sub> O=	0.0001 kg/MMBtu
EPA STP:	68 °F	14.696 psia	CO <sub>2</sub> =	61.46 kg/MMBtu	CO <sub>2</sub> =	53.06 kg/MMBtu
Heat Content	1,342	Btu/scf (EPA)	CH <sub>4</sub> =	0.003 kg/MMBtu	CH <sub>4</sub> =	0.001 kg/MMBtu
Fuel HHV Correction Factor	1.316					

### Heater Emission Calculations

Pollutants									
<b>PM</b>	7.6 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.316	=	0.016 Tons	
	MMScf (EPA)	Hr	1,342 Btu	Year	2,000 Lb			Year	
<b>SO<sub>2</sub></b>	0.60 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.316	=	0.001 Tons	
	MMScf (EPA)	Hr	1,342 Btu	Year	2,000 Lb			Year	
<b>NO<sub>x</sub></b>	100 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.316	=	0.215 Tons	
	MMScf (EPA)	Hr	1,342 Btu	Year	2,000 Lb			Year	
<b>CO</b>	84 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.316	=	0.180 Tons	
	MMScf (EPA)	Hr	1,342 Btu	Year	2,000 Lb			Year	
<b>VOC</b>	5.5 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.316	=	0.012 Tons	
	MMScf (EPA)	Hr	1,342 Btu	Year	2,000 Lb			Year	
<b>HAP</b>	1.89 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.316	=	0.004 Tons	
	MMScf (EPA)	Hr	1,342 Btu	Year	2,000 Lb			Year	
<b>CO<sub>2</sub></b>	0.5 MMBtu	53.06 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons		=	256.18 Tons	
	Hr	MMBtu	kg	Year	1 Metric Ton			Year	
<b>N<sub>2</sub>O</b>	0.5 MMBtu	0.0001 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons		=	0.00048 Tons	
	Hr	MMBtu	kg	Year	1 Metric Ton			Year	
<b>CH<sub>4</sub></b>	0.5 MMBtu	0.001 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons		=	0.00483 Tons	
	Hr	MMBtu	kg	Year	1 Metric Ton			Year	
<b>Mass Sum</b>	256.18 Tons	+	0.0005 Tons	+	0.0048 Tons		=	256.18 Tons	
	Year		Year		Year			Year	
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				
<b>CO<sub>2</sub>e</b>	256.18 TPY	X 1	0.0005 TPY	X 298	0.0048 TPY	X 25	=	256.44 Tons	
	256.18	+	0.14	+	0.12			Year	
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				

<sup>1</sup> AP-42 emission factors taken from Chapter 1.4. Based on natural gas with 1020 btu/scf, and corrected in calculations. From Chapter 1.5, propane emission factors are equivalent on a heat basis to methane factors, except the NO<sub>x</sub> factor is 1.5x higher.

## Heater Treater 18-13

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### Heater Emission Calculations

Pollutants									
PM	7.6 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.016 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
SO <sub>2</sub>	0.60 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.001 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
NO <sub>x</sub>	100 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.215 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
CO	84 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.180 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
VOC	5.5 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.012 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
HAP	1.89 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.004 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
CO <sub>2</sub>	0.5 MMBtu	53.06 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons	=	256.18 Tons	Year	
	Hr	MMBtu	kg	Year	1 Metric Ton				
N <sub>2</sub> O	0.5 MMBtu	0.0001 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons	=	0.00048 Tons	Year	
	Hr	MMBtu	kg	Year	1 Metric Ton				
CH <sub>4</sub>	0.5 MMBtu	0.001 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons	=	0.00483 Tons	Year	
	Hr	MMBtu	kg	Year	1 Metric Ton				
Mass Sum	256.18 Tons	+	0.0005 Tons	+	0.0048 Tons	=	256.18 Tons	Year	
	Year		Year		Year				
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				
CO <sub>2</sub> e	256.18 TPY	X 1	0.0005 TPY	X 298	0.0048 TPY	X 25	=	256.44 Tons	Year
	256.18	+	0.14	+	0.12				
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				

<sup>1</sup> AP-42 emission factors taken from Chapter 1.4. Based on natural gas with 1020 btu/scf, and corrected in calculations. From Chapter 1.5, propane emission factors are equivalent on a heat basis to methane factors, except the NO<sub>x</sub> factor is 1.5x higher.

## Heater Treater at 14-9

<b>Data:</b>			<b>AP-42 EF (NG)</b>		Based on NG with Btu/Content of 1020	
H <sub>2</sub> S mol%	0.00%	mol%	PM=	7.6 Lb/MMScf	<b>GWP*</b>	*Revised 11/29/2013
Op Hours	8760	Hrs	NO <sub>x</sub> =	100 Lb/MMScf		
Heat Content	1,462	Btu/scf (Ind.)	CO=	84 Lb/MMScf	N <sub>2</sub> O=	298
Flowrate	0.342	MScf/Hr (Ind.)	VOC=	5.5 Lb/MMScf	CO <sub>2</sub> =	1
Heat Input	500,000	Btu/hr	HAP=	1.89 Lb/MMScf	CH <sub>4</sub> =	25
			SO <sub>2</sub> =	0.60 Lb/MMScf		
Use btu/scf(EPA) for PM, NO <sub>x</sub> , CO, VOC. Factors for EPA STP (also ADEM STP). SO <sub>2</sub> factor already for Industry STP (from Al. Oil & Gas Board)			<b>(Table C-1 &amp; C-2) 40 CFR Part 98 Sub C GHG Emission Factors for C<sub>3</sub></b>		<b>(Table C-1 &amp; C-2) 40 CFR Part 98 Sub C GHG Emission Factors for C<sub>1</sub></b>	
Ind. STP:	60 °F	14.65 psia	N <sub>2</sub> O=	0.0006 kg/MMBtu	N <sub>2</sub> O=	0.0001 kg/MMBtu
EPA STP:	68 °F	14.696 psia	CO <sub>2</sub> =	61.46 kg/MMBtu	CO <sub>2</sub> =	53.06 kg/MMBtu
Heat Content	1,444	Btu/scf (EPA)	CH <sub>4</sub> =	0.003 kg/MMBtu	CH <sub>4</sub> =	0.001 kg/MMBtu
Fuel HHV Correction Factor	1.416					

### Heater Emission Calculations

Pollutants									
<b>PM</b>	7.6 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.016 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
<b>SO<sub>2</sub></b>	0.60 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.001 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
<b>NO<sub>x</sub></b>	100 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.215 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
<b>CO</b>	84 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.180 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
<b>VOC</b>	5.5 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.012 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
<b>HAP</b>	1.89 Lb	0.500 MMBtu	Scf (EPA)	8,760 Hr	1 Ton	1.416	=	0.004 Tons	Year
	MMScf (EPA)	Hr	1,444 Btu	Year	2,000 Lb				
<b>CO<sub>2</sub></b>	0.5 MMBtu	53.06 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons		=	256.18 Tons	Year
	Hr	MMBtu	kg	Year	1 Metric Ton				
<b>N<sub>2</sub>O</b>	0.5 MMBtu	0.0001 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons		=	0.00048 Tons	Year
	Hr	MMBtu	kg	Year	1 Metric Ton				
<b>CH<sub>4</sub></b>	0.5 MMBtu	0.001 kg	0.001 Metric Ton	8,760 Hr	1.1023 Tons		=	0.00483 Tons	Year
	Hr	MMBtu	kg	Year	1 Metric Ton				
<b>Mass Sum</b>	256.18 Tons	+	0.0005 Tons	+	0.0048 Tons		=	256.18 Tons	Year
	Year		Year		Year				
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				
<b>CO<sub>2</sub>e</b>	256.18 TPY	X 1	0.0005 TPY	X 298	0.0048 TPY	X 25	=	256.44 Tons	Year
	256.18	+	0.14	+	0.12				
	CO <sub>2</sub>		N <sub>2</sub> O		CH <sub>4</sub>				

<sup>1</sup> AP-42 emission factors taken from Chapter 1.4. Based on natural gas with 1020 btu/scf, and corrected in calculations. From Chapter 1.5, propane emission factors are equivalent on a heat basis to methane factors, except the NO<sub>x</sub> factor is 1.5x higher.

### Potential Flare Emission Calculations

<sup>1</sup> Rated Heat Capacity (MMBtu/Hr) = Flowrate (Scf/Hr) \* Heat Content (Btu/Scf) \* (MMBtu/10<sup>6</sup> Btu)

<sup>2</sup> VOC (Lb/Lb-mole) =  $\Sigma(\text{Mole\% of Each Compound}) * (1\%/100) * \text{MW of Each Compound}$  -See Flare GHG Spread Sheet for gas analysis

<sup>3</sup> Has to be maintained <500 lb/hr or 20 ppbv offsite concentration could potentially be exceeded

$$\text{H}_2\text{S (Lb/hr)} = \text{Volume (Scf/hr)} * (1 \text{ lb-mol}/380.67) * (\text{H}_2\text{S mol}\%) * (34.08 \text{ Lb H}_2\text{S/Lb-mol})$$

<sup>4</sup> SO<sub>2</sub> Conversion Factor 168.3 Lb SO<sub>2</sub>/MScf of Gas

$$=(1,000 \text{ Scf/MScf}) * (1\text{Lb-Mole}/380.67 \text{ Scf}) * (64.066 \text{ Lb SO}_2/\text{Lb-Mole})$$

<sup>5</sup> Assuming the flare is 98% efficient

<sup>6</sup> Calculated using the gas analysis:

$\Sigma Y_j * R_j$  where,  $Y_j$ = mole fraction of gas hydrocarbon constituents' j (such as methane, ethane, propane, carbon dioxide, etc.) and  $R_j$ = number of carbon atoms in gas hydrocarbon constituent j: 1 for methane and carbon dioxide, 2 for ethane, 3 for propane, etc.

<sup>7</sup> Flare assumed to be "lightly smoking" in AP-42 table 13.5-1

<sup>8</sup> Hexane is a HAP. Assume Hexanes+ or Hexane are HAPS

### Potential Flare Emission Calculations

<sup>1</sup> Rated Heat Capacity (MMBtu/Hr) = Flowrate (Scf/Hr) \* Heat Content (Btu/Scf) \* (MMBtu/10<sup>6</sup> Btu)

<sup>2</sup> VOC (Lb/Lb-mole) =  $\Sigma(\text{Mole\% of Each Compound}) * (1\%/100) * \text{MW of Each Compound}$  -See Flare GHG Spread Sheet for gas analysis

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<sup>4</sup> SO<sub>2</sub> Conversion Factor 168.3 Lb SO<sub>2</sub>/MScf of Gas

$$=(1,000 \text{ Scf/MScf}) * (1\text{Lb-Mole}/380.67 \text{ Scf}) * (64.066 \text{ Lb SO}_2/\text{Lb-Mole})$$

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<sup>4</sup> SO<sub>2</sub> Conversion Factor 168.3 Lb SO<sub>2</sub>/MScf of Gas

$$=(1,000 \text{ Scf/MScf}) * (1\text{Lb-Mole}/380.67 \text{ Scf}) * (64.066 \text{ Lb SO}_2/\text{Lb-Mole})$$

<sup>5</sup> Assuming the flare is 98% efficient

<sup>6</sup> Calculated using the gas analysis:

$\Sigma Y_j * R_j$  where,  $Y_j$ = mole fraction of gas hydrocarbon constituents' j (such as methane, ethane, propane, carbon dioxide, etc.) and  $R_j$ = number of carbon atoms in gas hydrocarbon constituent j: 1 for methane and carbon dioxide, 2 for ethane, 3 for propane, etc.

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<sup>8</sup> Hexane is a HAP. Assume Hexanes+ or Hexane are HAPS

### Potential Flare Emission Calculations

Pollutants																	
PM <sub>1</sub>	40	µg	12660.9	scf (Ind.)	2.2E-9	lb	8,760	Hr	1	Ton	28.31685	L	1.01	scf(EPA)	=	0.140	Tons
	L			Hr		µg		Year		2,000	Lb		scf (EPA)	1		scf(Ind.)	Year
SO <sub>2</sub>	168.3	Lb SO <sub>2</sub> <sup>4</sup>	12.661	MScf (Ind.)	0.001%	H <sub>2</sub> S Mol%	8,760	Hr		1	Ton				=	0.057	Tons
		MScf (Ind.)		Hr				Year		2,000	Lb					Year	
NO <sub>x</sub>	0.068	lb	17.996	MMBtu			8,760	Hr		1	Ton				=	5.360	Tons
		MMBtu		Hr				Year		2,000	Lb					Year	
CO	0.37	lb	17.996	MMBtu			8,760	Hr		1	Ton				=	29.164	Tons
		MMBtu		Hr				Year		2,000	Lb					Year	
VOC <sup>5</sup>	12,660.9	Scf (Ind.)	1	lb-mol	10.55	Lb VOC	8,760	Hr		1	Ton	2.00%	Inv. DRE		=	30.742	Tons
		Hr		380.67	scf (Ind.)		Lb-Mole		Year		2,000	Lb				Year	
HAPs <sup>8</sup>	12,660.9	Scf (Ind.)	1	lb-mol		1.10	Lb C <sub>6</sub>	8,760	Hr		1	Ton	2.00%	Inv. DRE	=	3.215	Tons
		Hr		380.67	scf (Ind.)		Lb-Mole		Year		2,000	Lb				Year	
CO <sub>2</sub> <sup>5,6</sup> of Combustion	98.00%	DRE	1.11E+08	Scf (Ind.)	1.60	lb-mol CO <sub>2</sub> (stoich.)		1	lb-mol gas		44.01	lb CO <sub>2</sub>	1	Ton	=	10,042.79	Tons
			Yr		1	lb-mol gas (stoich.)		380.67	scf (Ind.)		lb-mole CO <sub>2</sub>		2,000	Lb		Year	
CO <sub>2</sub> of Fuel	1.11E+08	Scf (Ind.)	0.76%	mol% CO <sub>2</sub>		1	lb-mol		44.01	Lb CO <sub>2</sub>	1	Ton			=	48.50	Tons
		Yr				380.67	scf (Ind.)		Lb-mole		2,000	Lb				Year	
N <sub>2</sub> O	0.001	MTon	0.001421	MMBtu	12,660.9	Scf (Ind.)	0.0001	kg		8,760	Hr	1.1023	Tons		=	0.0174	Tons
		kg		Scf (Ind.)		Hr		MMBtu			Year		1 Metric Ton			Year	
CH <sub>4</sub> Uncombusted	1.11E+08	Scf (Ind.)	2.00%	Inv. DRE	62.23%	mol% CH <sub>4</sub>		1	lb-mol		16.043	Lb CH <sub>4</sub>	1	Ton	=	29.09	Tons
		Yr						380.675	scf (Ind.)		Lb-mole		2,000	Lb		Year	
Mass Sum	10,091.29	Tons			+	0.0174	Tons			+	29.09	Tons			=	10,120.40	Tons
		Year				Year					Year					Year	
		CO <sub>2</sub>				N <sub>2</sub> O					CH <sub>4</sub>						
CO <sub>2</sub> e	10,091.29	TPY	X 1		0.0174	TPY	X 298				29.09	TP	X 25		=	10,823.66	Tons
		10,091.29			+	5.18			+		727.19					Year	
		CO <sub>2</sub>				N <sub>2</sub> O					CH <sub>4</sub>						

<sup>1</sup> Rated Heat Capacity (MMBtu/Hr) = Flowrate (Scf/Hr) \* Heat Content (Btu/Scf) \* (MMBtu/10<sup>6</sup> Btu)

<sup>2</sup> VOC (Lb/Lb-mole) =  $\Sigma(\text{Mole\% of Each Compound}) * (1\%/100) * \text{MW of Each Compound}$  -See Flare GHG Spread Sheet for gas analysis

<sup>3</sup> Has to be maintained <500 lb/hr or 20 ppbv offsite concentration could potentially be exceeded

$$\text{H}_2\text{S (Lb/hr)} = \text{Volume (Scf/hr)} * (1 \text{ lb-mol}/380.67) * (\text{H}_2\text{S mol}\%) * (34.08 \text{ Lb H}_2\text{S}/\text{Lb-mol})$$

<sup>4</sup> SO <sub>2</sub> Conversion Factor	168.3 Lb SO <sub>2</sub> /Mscf of Gas					
$= (1.000 \text{ Scf/Mscf}) * (1 \text{ Lb-Mole}/380.67 \text{ Scf}) * (64.066 \text{ Lb SO}_2/\text{Lb-Mole})$						

<sup>5</sup> Assuming the flare is 98% efficient

<sup>6</sup> Calculated using the gas analysis:

$\Sigma Y_j * R_j$  where,  $Y_j$ = mole fraction of gas hydrocarbon constituents' j (such as methane, ethane, propane, carbon dioxide, etc.) and  $R_j$ = number of carbon atoms in gas hydrocarbon constituent j: 1 for methane and carbon dioxide, 2 for ethane, 3 for propane, etc.

<sup>7</sup> Flare assumed to be "lightly smoking" in AP-42 table 13.5-1

<sup>8</sup> Hexane is a HAP. Assume Hexanes+ or Hexane are HAPS



### Potential Flare Emission Calculations

<sup>1</sup> Rated Heat Capacity (MMBtu/Hr) = Flowrate (Scf/Hr) \* Heat Content (Btu/Scf) \* (MMBtu/10<sup>6</sup> Btu)

<sup>2</sup> VOC (Lb/Lb-mole) =  $\Sigma(\text{Mole\% of Each Compound}) * (1\%/100) * \text{MW of Each Compound}$  -See Flare GHG Spread Sheet for gas analysis

<sup>3</sup> Has to be maintained <500 lb/hr or 20 ppbv offsite concentration could potentially be exceeded

$$\text{H}_2\text{S (Lb/hr)} = \text{Volume (Scf/hr)} * (1 \text{ lb-mol}/380.67) * (\text{H}_2\text{S mol}\%) * (34.08 \text{ Lb H}_2\text{S/Lb-mol})$$

<sup>4</sup> SO<sub>2</sub> Conversion Factor 168.3 Lb SO<sub>2</sub>/MScf of Gas

$$=(1,000 \text{ Scf/MScf}) * (1\text{Lb-Mole}/380.67 \text{ Scf}) * (64.066 \text{ Lb SO}_2/\text{Lb-Mole})$$

<sup>5</sup> Assuming the flare is 98% efficient

<sup>6</sup> Calculated using the gas analysis:

$\Sigma Y_j * R_j$  where,  $Y_j$ = mole fraction of gas hydrocarbon constituents' j (such as methane, ethane, propane, carbon dioxide, etc.) and  $R_j$ = number of carbon atoms in gas hydrocarbon constituent j: 1 for methane and carbon dioxide, 2 for ethane, 3 for propane, etc.

<sup>7</sup> Flare assumed to be "lightly smoking" in AP-42 table 13.5-1

<sup>8</sup> Hexane is a HAP. Assume Hexanes+ or Hexane are HAPS